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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO TO UNITED STATES POSTAL SERVICE (APWU/USPS-21-22) (March 29, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO ("APWU") directs the following interrogatories, which seeks information relevant to the rebuttal testimony of the APWU, to the United States Postal Service.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson Jennifer L. Wood Counsel for American Postal Workers Union, AFL-CIO APWU/USPS-21 In response to APWU/USPS-T1-34 Mr. Williams stated that "the Postal Service is currently evaluating new service areas and assessing any potential changes required for Express Mail and Priority Mail service standards."

- a) Please provide the current performance data for Priority Mail and Express Mail.
- b) Once the evaluation referenced in Mr. Williams' response is complete, please provide the list of changed 3-digit Zip Code pairs for Priority Mail and Express Mail.

APWU/USPS-22 Does the Postal Service measure the volume of "turnaround" Priority Mail?

- a) What is the current percentage of Priority Mail that currently receives overnight delivery?
- b) What percentage of Priority Mail that currently receives overnight delivery will shift to 2-day delivery in the new rationalized network?